

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

GRAND ENCAMPMENT OF KNIGHTS
TEMPLAR OF THE UNITED STATES OF
AMERICA, et al.,

Plaintiffs,

v.

CONFERENCE OF GRAND MASTERS OF
MASONS IN NORTH AMERICA, INC.,
et al.,

Defendants.

Case No. 1:11-cv-00463-JD

**SUPPLEMENT TO
MEMORANDUM OF LAW IN SUPPORT OF MOTION TO DISMISS BY
DEFENDANTS CONFERENCE OF GRAND MASTERS OF MASONS IN NORTH
AMERICA, INC., ED BOUSQUET, AND RICHARD SWANEY**

NOW COME defendants Conference of Grand Masters of Masons in North America, Inc., Ed Bousquet, and Richard Swaney (collectively, “Defendants”), by and through their attorneys, Wiggin & Nourie, P.A., and respectfully submit this supplement to their memorandum of law in support of their motion to dismiss, stating as follows:

1. In Defendants’ memorandum of law in support of their motion to dismiss (the “Memorandum of Law”), Defendants’ counsel erred four times by referring to the Grand Encampment of Knights Templar of the United States of America (the “Grand Encampment”) when counsel meant instead to refer to the Grand Priory of the Reformed and Rectified Rite of the United States of America (the “Grand Priory”). Defendants submit this Supplement to clarify the intended meaning of the statements containing the error.

2. The Memorandum of Law represents that Plaintiffs' allege in their Declaration that defendants Swaney and Bousquet each issued statements to their Grand Lodges regarding the irregularity of the Grand Encampment. See Memorandum of Law at 4, 5. To the extent that these representations refer to the Grand Encampment, they are erroneous, as they should have instead referred to the Grand Priory. See Plaintiffs' Declaration at ¶¶ 22, 27.

3. The Memorandum of Law represents that defendants Bousquet and Swaney each swore that they issued statements to their Grand Lodges regarding the irregularity of the Grand Encampment. See Memorandum of Law at 11. To the extent that these representations refer to the Grand Encampment, they are erroneous, as they should have instead referred to the Grand Priory. See Swaney Declaration at ¶ 23; Bousquet Declaration at ¶ 27.

4. The Memorandum of Law represents that defendant Bousquet "gathered information regarding the lineage of the Great Priory of Occitania and/or the Grand Encampment." See Memorandum of Law at 5. To the extent that this representation refers to the Grand Encampment, it is erroneous, as it should have instead referred to the Grand Priory. See Bousquet Declaration at ¶ 16.

5. Defendants' counsel does not believe that the Plaintiffs have been prejudiced by the errors described above, as they are not material to the motion or the objection thereto.

Respectfully submitted,

CONFERENCE OF GRAND MASTERS OF
MASONS IN NORTH AMERICA, INC.,
ED BOUSQUET, and
RICHARD SWANEY,

By their attorneys,

WIGGIN & NOURIE, P.A.

Dated: December 13, 2011

By: /s/ Jennifer Turco Beaudet

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CERTIFICATE OF SERVICE

A copy of the foregoing Supplement to Memorandum of Law in Support of Motion to Dismiss by Defendants Conference of Grand Masters of Masons in North America, Inc., Ed Bousquet, and Richard Swaney has this day been forwarded via CM/ECF to:

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